

Matthew S. Melamed (SBN 260272)
KELLER ROHRBACK L.L.P.
180 Grand Avenue, Suite 1380
Oakland, CA 94612
(510) 463-3900, Fax (510) 463-3901
mmelamed@kellerrohrback.com

Attorney for Plaintiffs

Additional Counsel in Signature Block

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF RICHMOND AND THE RICHMOND JOINT POWERS FINANCING AUTHORITY.

Plaintiffs.

V.

ROYAL BANK OF CANADA, JP MORGAN CHASE, PUBLIC RESOURCES ADVISORY GROUP, AND THE MAJORS GROUP

Defendants.

No. 3:25-cv-03348-CRB

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING CASE
MANAGEMENT DEADLINES**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, Plaintiffs City of Richmond and Richmond Joint Powers Financing Authority (collectively, "Plaintiffs") and Defendants Royal Bank of Canada and Public Resources Advisory Group (collectively, "Defendants,"¹ and, together with Plaintiffs, "the Parties"), by and through their counsel, hereby stipulate as follows:

WHEREAS, on June 23, 2025, the Court entered the Parties' Joint Stipulation To Extend Current Case Deadlines (ECF No. 21);

¹ Though named as a defendant in the caption above, the Amended Complaint, ECF No. 22, no longer asserts any claims against JPMorgan Chase Bank N.A. (“JPMC”), which is no longer a party to this Action. Further, despite numerous attempts, Plaintiffs have not yet been able to effectuate service on defendant The Majors Group.

1 WHEREAS, pursuant to the deadlines established by ECF No. 21, on July 9, 2025, Plaintiffs
2 filed an amended complaint in this Action (the “Unjust Enrichment Action”) (ECF No. 22); on July 30,
3 2025, the Parties met and conferred regarding initial disclosures, early settlement, ADR process
4 selection, and discovery plan; and on July 30, 2025, the Parties filed ADR Certifications (ECF Nos.
5 23-25);
6

7 WHEREAS, on August 12, 2025, the Court entered a stipulation staying the remaining case
8 deadlines established by ECF No. 21 because the City Attorney for the City of Richmond, the
9 prosecuting authority for Plaintiffs (“Plaintiffs’ Prosecuting Authority”), filed a California False
10 Claims Act case against Royal Bank of Canada and JPMC based on allegations related to this action
11 that remained under seal (the “CA FCA Action”), and the parties to the Unjust Enrichment Action
12 agreed that, once the CA FCA Action was unsealed, they would seek relation of the two actions (ECF
13 No. 27);
14

15 WHEREAS, on September 30, 2025, the parties to the Unjust Enrichment Action moved to
16 relate the CA FCA Action to this case (ECF No. 28);
17

18 WHEREAS, on October 1, 2025, the Court entered an order relating the CA FCA Action to this
19 case (ECF No. 30);
20

21 WHEREAS, the parties to the two actions met and conferred and determined that, since
22 Plaintiffs’ Prosecuting Authority intends to amend the complaint in the CA FCA Action, the parties
23 should wait to set further deadlines until after the amendment is filed so that they can confer regarding
24 whether they will stipulate to consolidate the actions and, if so, for what purposes;
25

26 WHEREAS, the Court entered a stipulated order providing a deadline of October 31, 2025 for
27 Plaintiffs’ Prosecuting Authority to file an amended complaint in the CA FCA Action and a deadline
28 of 14 days after the amended CA FCA Action complaint is filed for the parties to jointly propose new
2

1 case management deadlines to replace the deadlines in ECF No. 21 that this Court stayed in ECF No.
2 27 (ECF No. 32);

3 WHEREAS, Plaintiffs and Plaintiffs' Prosecuting Authority have asked Defendants for
4 additional time to confer regarding amendments to the CA FCA Action, and Defendants do not object
5 to Plaintiffs' request;

6 WHEREAS, Plaintiffs and Plaintiffs' Prosecuting Authority have also conferred with counsel
7 for JPMC, which is not a party to this action but only to the CA FCA Action, and which also does not
8 object to Plaintiffs' request;

9 NOW, THEREFORE, THE PARTIES STIPULATE AND PROPOSE that:

10 1. Plaintiffs' Prosecuting Authority will file an amended complaint in the CA FCA Action
11 by December 5, 2025;

12 2. Within 14 days after the amended CA FCA Action complaint is filed, the parties shall
13 jointly propose new case management deadlines to replace the deadlines in ECF No. 21
14 that this Court stayed in ECF No. 27.

15
16 Submitted this 29th Day of October, 2025.

1 KELLER ROHRBACK L.L.P.
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3 By s/ Matthew S. Melamed

4 Matthew S. Melamed (SBN 260272)
5 180 Grand Avenue, Suite 1380
6 Oakland, CA 94612
7 (510) 463-3900
8 Fax (510) 463-3901
9 mmelamed@kellerrohrback.com

10 Gary Gotto
11 Robert Bartels
12 KELLER ROHRBACK L.L.P.
13 3101 North Central Avenue, Suite 1400
14 Phoenix, AZ 85012
15 Telephone: (602) 248-0088
Facsimile: (602) 248-2822
Email: ggotto@kellerrohrback.com
rbartels@kellerrohrback.com

16 R. Bradley Miller
17 R. BRADLEY MILLER LAW
18 301 North Alfred Street
19 Alexandria, VA 22314
Telephone: (919) 608-0795
Email: rbm@rbradleymillerlaw.com

20 Dave Aleshire (SBN 65022)
Richmond City Attorney
21 Floy Andrews (SBN 187375)
Richmond Senior Assistant City Attorney
ALESHIRE & WYNDER, L.L.P.
1970 Broadway, Suite 920
Oakland, CA 94612
Telephone: (510) 337-2810
Facsimile: (949) 223-1180
Email: dalshire@awattorneys.com
fandrews@awattorneys.com

22 *Attorneys for the City of Richmond and the Richmond*
23 *Joint Powers Financing Authority*

24 STRADLING YOCCA CARLSON & RAUTH LLP
25

26 By s/ Justin Owens

27 JUSTIN OWENS, State Bar No. 254733
jowens@stradlinglaw.com
28 JASON DE BRETTVILLE, State Bar No. 195069
jdebretteville@stradlinglaw.com

1
2 STRADLING YOCCA CARLSON & RAUTH
3 LLP
4 660 Newport Center Drive, Suite 1600
5 Newport Beach, CA 92660-6422
6 Telephone: 949 725 4000
7 Facsimile: 949 725 4100

8
9
10 *Attorneys for Defendant Public Resources Advisory
11 Group*

12 JONES DAY

13
14 By s/ Matthew J. Silveira
15 Matthew J. Silveira (SBN 264250)
16 (msilveira@jonesday.com)
17 JONES DAY
18 555 California St., 26th Floor
19 San Francisco, CA 94104
Telephone: (415) 875-5715

20 Jason Jurgens (pro hac vice forthcoming)
21 jjurgens@jonesday.com
22 Lauri W. Sawyer (pro hac vice forthcoming)
23 lsawyer@jonesday.com
24 JONES DAY
25 250 Vesey Street
26 New York, NY 10281
27 Telephone: (212) 326-3939
28 Facsimile: (212) 755-7306

29 *Attorneys for Defendant Royal Bank of Canada*

30 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

31 Date

32 October 30, 2025

33 
34 The Honorable Charles R. Breyer, Senior District Judge
35 United States District Court for the Northern District of
36 California